

# **STATE COURT FILE**

2015-60723 / Court: 133

NO. \_\_\_\_\_

ARLEEN SANCHEZ	§	IN THE DISTRICT COURT
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
NOAH'S TRANSPORT,	§	
L.L.C., AND JUAN GOMEZ	§	_____ JUDICIAL DISTRICT

**PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Arleen Sanchez, hereinafter referred to as Plaintiff, complaining of Noah's Transport, L.L.C. and Juan Gomez, hereinafter referred to as Defendants, and would respectfully show to the Court as follows:

1. Discovery is intended to be conducted under Level 3, Texas Rules of Civil Procedure, 190.4.
2. Plaintiff is a resident citizen of Waller County, Texas.
3. Defendant, Noah's Transport, L.L.C., is a Kansas limited liability company, whose only named member is a Kansas resident, which qualifies Defendant, Noah's Transport, L.L.C., as a nonresident of the State of Texas. Defendant, Noah's Transport, L.L.C., purposefully availed itself of Texas jurisdiction by doing business in the State of Texas and by owning a motor vehicle involved in a collision in the State of Texas. Defendant, Noah's Transport, L.L.C., is not registered to do business in the State of Texas and therefore can be served by serving the Texas Secretary of State at Service of Process, Secretary of State, P.O. Box 12079, Austin, Texas 78711-2079, pursuant to Section 17.044(a)(1) of the Texas Civil Practices and Remedies Code. The Texas Secretary of State shall provide notice to Defendant, Noah's Transport, L.L.C., by mailing a copy of the process to Defendant, Noah's Transport, L.L.C., at its home office: Noe R. Rivera, 5010

N. Saker St., Wichita, Kansas 67219, pursuant to Section 17.045(a) of the Texas Civil Practices and Remedies Code.

4. Defendant, Juan Gomez, is a individual, nonresident of the State of Texas who was involved in a collision while operating a motor vehicle in the State of Texas. As such under the Texas Long-Arm Jurisdiction over nonresident Motor Vehicle Operator found in V.T.C.A., Civil Practice & Remedies Code, Chapter 17, Subchapter D §§ 17.061, 17.062, 17.063 and 17.064. Under these circumstances, the Chairman of the Texas Transportation Commission is an agent for service of process on Defendant, Juan Gomez. Furthermore, the cause of action alleged herein arises out of acts and omissions of Defendant, Juan Gomez, occurring in the State of Texas. Defendant, Juan Gomez, may be served with service of process by serving the Chairman of the Texas Transportation Commission, Tryon D. Lewis, 125 E. 11<sup>th</sup> Street, Austin, Texas 78701-2483. The Chairman of the Texas Transportation Commission shall mail to the nonresident a copy of the process and notice that the process has been served on the Chairman by registered mail, or by certified mail, return receipt requested, with postage prepaid, to Juan Gomez, 921 Pheasant Ridge, Emporia, Kansas 66801.

5. This Court has jurisdiction over this case because this cause of action is for negligence and the subject matter of this lawsuit and the amount in controversy are all within the jurisdictional limits of this Court. Further, venue is proper in this Court because all or a substantial portion of the acts, events and/or omissions giving rise to the cause of action and the acts, events and/or omissions of negligence that proximately caused the occurrence in question and the injuries and damages sustained by your Plaintiff occurred within the territorial limits of Harris County, Texas.

10/12/2015 5:05:30 PM  
 Chris Daniel - District Clerk  
 Harris County  
 Envelope No: 7339190  
 By: CUERO, NELSON  
 Filed: 10/12/2015 5:05:30 PM

2015-60728 / COURT 133

FOR EACH PARTY SERVED YOU MUST FURNISH ONE (1) COPY OF THE PLEADING  
 FOR WRITS FURNISH TWO (2) COPIES OF THE PLEADING PER PARTY TO BE SERVED

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

TYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types): Plaintiff's Original Petition

FILE DATE OF MOTION: October 12, 2015  
 Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: Noah's Transport, L.L.C.

ADDRESS: Service of Process, Secretary of State, P.O. Box 12079, Austin, Texas 78711-2079

AGENT, (if applicable): Texas Secretary of State

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): \_\_\_\_\_

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP ☐ CONSTABLE  
☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_  
☐ MAIL ☒ CERTIFIED MAIL  
☐ PUBLICATION:  
 Type of Publication: ☐ COURTHOUSE DOOR, or  
☐ NEWSPAPER OF YOUR CHOICE: \_\_\_\_\_  
☐ OTHER, explain \_\_\_\_\_

\*\*\*\*\*

\*\*\*\*

2. NAME: Juan Gomez

ADDRESS: 921 Pheasant Ridge, Emporia, Kansas 66801

AGENT, (if applicable): Chairman of the Texas Transportation Commission

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): \_\_\_\_\_

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP ☐ CONSTABLE  
☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_  
☐ MAIL ☒ CERTIFIED MAIL  
☐ PUBLICATION:  
 Type of Publication: ☐ COURTHOUSE DOOR, or  
☐ NEWSPAPER OF YOUR CHOICE: \_\_\_\_\_  
☐ OTHER, explain \_\_\_\_\_

ATTORNEY (OR ATTORNEY'S AGENT) REQUESTING SERVICE:

NAME: Gene S. Hagood TEXAS BAR NO./ID NO. 08698400

MAILING ADDRESS: 1520 E. Highway 6, Alvin, TX 77511

PHONE NUMBER: 281 331-5757 FAX NUMBER: 281 331-1105  
 area code phone number area code fax number

EMAIL ADDRESS: firm@h-nlaw.com

SERVICE REQUESTS WHICH CANNOT BE PROCESSED BY THIS OFFICE WILL BE HELD FOR 30 DAYS PRIOR TO CANCELLATION. FEES WILL BE REFUNDED ONLY UPON REQUEST, OR AT THE DISPOSITION OF THE CASE. SERVICE REQUESTS MAY BE REINSTATED UPON APPROPRIATE ACTION BY THE PARTIES.

INSTRUMENTS TO BE SERVED:

(Fill In Instrument Sequence Number, i.e. 1st, 2nd, etc.)

ORIGINAL PETITION ☒  
 \_\_\_\_\_ AMENDED PETITION  
 \_\_\_\_\_ SUPPLEMENTAL PETITION

COUNTERCLAIM  
 \_\_\_\_\_ AMENDED COUNTERCLAIM  
 \_\_\_\_\_ SUPPLEMENTAL COUNTERCLAIM

CROSS-ACTION:  
 \_\_\_\_\_ AMENDED CROSS-ACTION  
 \_\_\_\_\_ SUPPLEMENTAL CROSS-ACTION

THIRD-PARTY PETITION:  
 \_\_\_\_\_ AMENDED THIRD-PARTY PETITION  
 \_\_\_\_\_ SUPPLEMENTAL THIRD-PARTY PETITION

INTERVENTION:  
 \_\_\_\_\_ AMENDED INTERVENTION  
 \_\_\_\_\_ SUPPLEMENTAL INTERVENTION

INTERPLEADER  
 \_\_\_\_\_ AMENDED INTERPLEADER  
 \_\_\_\_\_ SUPPLEMENTAL INTERPLEADER

INJUNCTION  
 MOTION TO MODIFY  
 SHOW CAUSE ORDER  
 TEMPORARY RESTRAINING ORDER

BILL OF DISCOVERY:  
 ORDER TO: \_\_\_\_\_  
 (specify)  
 MOTION TO: \_\_\_\_\_  
 (specify)

PROCESS TYPES:

NON WRIT:  
 CITATION  
 ALIAS CITATION  
 PLURIES CITATION  
 SECRETARY OF STATE CITATION  
 COMMISSIONER OF INSURANCE  
 HIGHWAY COMMISSIONER  
 CITATION BY PUBLICATION  
 NOTICE  
 SHORT FORM NOTICE

PRECEPT (SHOW CAUSE)  
 RULE 106 SERVICE

SUBPOENA

WRITS:  
 ATTACHMENT (PROPERTY)  
 ATTACHMENT (WITNESS)  
 ATTACHMENT (PERSON)

CERTIORARI

EXECUTION  
 EXECUTION AND ORDER OF SALE

GARNISHMENT BEFORE JUDGMENT  
 GARNISHMENT AFTER JUDGMENT

HABEAS CORPUS  
 INJUNCTION  
 TEMPORARY RESTRAINING ORDER

PROTECTIVE ORDER (FAMILY CODE)  
 PROTECTIVE ORDER (CIVIL CODE)

POSSESSION (PERSON)  
 POSSESSION (PROPERTY)

SCIRE FACIAS  
 SEQUESTRATION  
 SUPERSEDEAS



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this December 7, 2015

Certified Document Number: 67416481 Total Pages: 2

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

10/12/2015 5:05:30 PM

Chris Daniel - District Clerk

Harris County

Envelope No: 7339190

By: CUERO, NELSON

Filed: 10/12/2015 5:05:30 PM

## CIVIL CASE INFORMATION SHEET

CAUSE NUMBER (FOR CLERK USE ONLY)

2015-60723 / Court: 133

COURT (FOR CLERK USE ONLY)

STYLED Arleen Sanchez v. Noah's Transport, L.L.C. and Juan Gomez

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

<b>1. Contact information for person completing case information sheet:</b> Name: <u>Gene S. Hagood</u> Email: <u>firm@h-nlaw.com</u> Address: <u>1520 E. Highway 6</u> Telephone: <u>(281) 331-5757</u> City/State/Zip: <u>Alvin, TX 77511</u> Fax: <u>(281) 331-1105</u> Signature: <u>[Signature]</u> State Bar No: <u>08698400</u> (Attach additional page as necessary to list all parties)		<b>Names of parties in case:</b> Plaintiff(s)/Petitioner(s): <u>Arleen Sanchez</u> Defendant(s)/Respondent(s): <u>Noah's Transport, L.L.C. and</u> <u>Juan Gomez</u>		<b>Person or entity completing sheet is:</b> <input type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____ Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____					
<b>2. Indicate case type, or identify the most important issue in the case (select only 1):</b>									
<b>Civil</b>			<b>Family Law</b>						
<b>Contract</b> <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: <b>Foreclosure</b> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract:		<b>Injury or Damage</b> <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <b>Malpractice</b> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input checked="" type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <b>Product Liability</b> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: <input type="checkbox"/> Other Injury or Damage:		<b>Real Property</b> <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: <b>Related to Criminal Matters</b> <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other:		<b>Marriage Relationship</b> <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <b>Divorce</b> <input type="checkbox"/> With Children <input type="checkbox"/> No Children <b>Other Family Law</b> <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other:		<b>Post-judgment Actions (non-Title IV-D)</b> <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other <b>Title IV-D</b> <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order <b>Parent-Child Relationship</b> <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child:	
<b>Employment</b> <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment:		<b>Other Civil</b> <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other:							
<b>Tax</b> <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax		<b>Probate &amp; Mental Health</b> <b>Probate/Wills/Intestate Administration</b> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other:							
<b>3. Indicate procedure or remedy, if applicable (may select more than 1):</b>									
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover					
<b>4. Indicate damages sought (do not select if it is a family law case):</b>									
<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input type="checkbox"/> Over \$1,000,000									





I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this December 7, 2015

Certified Document Number: 67416479 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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CONFIRMED FILE DATE: 10/16/2015  
PLAINTIFF: SANCHEZ, ARLEEN  
vs.  
DEFENDANT: NOAH'S TRANSPORT L L C

Case 4:15-cv-03541 Document 1-3 Filed on 12/07/15 in TXSD Page 9 of 23

In The 133rd  
Judicial District Court  
of Harris County, Texas  
133RD DISTRICT COURT  
Houston, TX

CITATION (CERTIFIED)

THE STATE OF TEXAS  
County of Harris

TO: GOMEZ, JUAN BY SERVING THE CHAIRMAN OF THE TEXAS TRANSPORTATION  
COMMISSION TRYON D LEWIS  
125 E 11TH STREET AUSTIN TEXAS 78701-2483  
FORWARD TO  
921 PHEASANT RIDGE EMPORIA KS 66801

**FILED**

Chris Daniel  
District Clerk

OCT 16 2015

Time:

Harris County, Texas

By

Deputy

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION

This instrument was filed on the 12th day of October, 2015, in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:

This citation was issued on 16th day of October, 2015, under my hand and seal of said Court.

Issued at request of:

HAGOOD, GENE S.

1520 E. HIGHWAY 6

ALVIN, TX 77511

Tel: (281) 331-5757

Bar No.: 8698400



CHRIS DANIEL, District Clerk

Harris County, Texas

161 Caroline Houston, Texas 77002

(P.O. Box 4651, Houston, Texas 77210)

GENERATED BY: TAYLOR, SHANELLE L 3VT//10215897

CLERK'S RETURN BY MAILING

Came to hand the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, and executed by mailing to Defendant certified mail, return receipt requested, restricted delivery, a true copy of this citation together with an attached copy of PLAINTIFF'S ORIGINAL PETITION to the following addressee at address:

ADDRESS

Service was executed in accordance with Rule 106(a) (2) TRCP, upon the Defendant as evidenced by the return receipt incorporated herein and attached hereto at \_\_\_\_\_

on \_\_\_\_\_ day of \_\_\_\_\_,

by U.S. Postal delivery to \_\_\_\_\_

This citation was not executed for the following reason: \_\_\_\_\_

CHRIS DANIEL, District Clerk  
HARRIS COUNTY, T E X A S

ADDRESSEE



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this December 7, 2015

Certified Document Number: 67581633 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

PLAINTIFF: SANCHEZ, ARLEEN  
vs.  
DEFENDANT: NOAHS TRANSPORT L L C

In The 133rd  
Judicial District Court  
of Harris County, Texas  
133RD DISTRICT COURT  
Houston, TX

Case 4:15-cv-03541 Document 1-3 Filed on 12/07/15 in TXSD Page 11 of 23

CITATION (CERTIFIED)

THE STATE OF TEXAS  
County of Harris

TO: NOAHS TRANSPORT L L C MAY BE SERVED BY SERVING THE TEXAS SECRETARY  
OF STATE  
P O BOX 12079 AUSTIN TEXAS 78711-2079  
FORWARD TO NOE R RIVERA  
5010 N SAKER ST WICHITA KS 67219

**FILED**

Chris Daniel  
District Clerk

OCT 16 2015

Time:

By

Harris County, Texas

Deputy

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION

This instrument was filed on the 12th day of October, 2015, in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:

This citation was issued on 16th day of October, 2015, under my hand and seal of said Court.

Issued at request of:

HAGOOD, GENE S.

1520 E. HIGHWAY 6

ALVIN, TX 77511

Tel: (281) 331-5757

Bar No.: 8698400



CHRIS DANIEL, District Clerk

Harris County, Texas

161 Caroline Houston, Texas 77002

(P.O. Box 4651, Houston, Texas 77210)

GENERATED BY: TAYLOR, SHANELLE L 3VT//10215897

CLERK'S RETURN BY MAILING

Came to hand the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, and executed by mailing to Defendant certified mail, return receipt requested, restricted delivery, a true copy of this citation together with an attached copy of PLAINTIFF'S ORIGINAL PETITION to the following addressee at address:

ADDRESS

Service was executed in accordance with Rule 106(a) (2) TRCP, upon the Defendant as evidenced by the return receipt incorporated herein and attached hereto at \_\_\_\_\_

on \_\_\_\_\_ day of \_\_\_\_\_,

by U.S. Postal delivery to \_\_\_\_\_

This citation was not executed for the following reason: \_\_\_\_\_

CHRIS DANIEL, District Clerk  
HARRIS COUNTY, T E X A S

CONFIRMED FILE DATE: 10/16/2015

Number: 67581687 - Page 1 of 1



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this December 7, 2015

Certified Document Number: 67581687 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

CONFIRMED FILE DATE: 10/22/2015

7015 1520 0003 3653 6522

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL RECEIPT**

Certified Mail Fee  
\$ 3.45

Extra Services & Fees (check box, add fee if appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$ <u>1.40</u>
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postage  
\$ 1.42

Total Postage  
\$ 2.67

Sent To  
Barbara Jordan

Street and Apt.  
225 E. 11th Street

City, State, Zip  
Austin, TX 78701

OCT 22 2015  
Postmark  
Chris Daniel  
District Clerk

2015-60723 133<sup>rd</sup>

See Reverse for Instructions

**Certified Mail service provides the following benefits:**

- A receipt (this portion of the Certified Mail label).
  - A unique identifier for your mailpiece.
  - Electronic verification of delivery or attempted delivery.
  - A record of delivery (including the recipient's signature) that is retained by the Postal Service™ for a specified period.
- Important Reminders:**
- You may purchase Certified Mail service with First-Class Mail®, First-Class Package Service®, or Priority Mail® service.
  - Certified Mail service is *not* available for international mail.
  - Insurance coverage is *not* available for purchase with Certified Mail service. However, the purchase of Certified Mail service does not change the insurance coverage automatically included with certain Priority Mail items.
  - For an additional fee, and with a proper endorsement on the mailpiece, you may request the following services:
    - Return receipt service, which provides a record of delivery (including the recipient's signature). You can request a hardcopy return receipt or an electronic version. For a hardcopy return receipt, complete PS Form 3811, *Domestic Return Receipt*; attach PS Form 3811 to your mailpiece;
    - Restricted delivery service, which provides delivery to the addressee specified by name, or to the addressee's authorized agent.
    - Adult signature service, which requires the signee to be at least 21 years of age (not available at retail).
    - Adult signature restricted delivery service, which requires the signee to be at least 21 years of age and provides delivery to the addressee specified by name, or to the addressee's authorized agent (not available at retail).
  - To ensure that your Certified Mail receipt is accepted as legal proof of mailing, it should bear a USPS postmark. If you would like a postmark on this Certified Mail receipt, please present your Certified Mail item at a Post Office™ for postmarking. If you don't need a postmark on this Certified Mail receipt, detach the barcoded portion of this label, affix it to the mailpiece, apply appropriate postage, and deposit the mailpiece.
- IMPORTANT: Save this receipt for your records.**

PS Form 3800, April 2015 (Reverse) PSN 7530-02-000-9047

**RECORDER'S MEMORANDUM**  
This instrument is of poor quality  
at the time of imaging



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this December 7, 2015

Certified Document Number: 67601784 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**



CONFIRMED FILE DATE: 10/22/2015

5T55 653E 3653 6515

7015 1520 0003 0000 0205 5T05

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
*Domestic Mail Only*

**OFFICIAL USE**

**RECEIVED**  
**MR**  
**OCT 22 2015**  
**Here**  
**Chris Daniel**  
**District Clerk**

**Certified Mail Fee**  
**\$ 3.45**

**Extra Services & Fees (check box, add fees as appropriate)**

☐ Return Receipt (hardcopy) \$ **2.70**

☐ Return Receipt (electronic) \$ **0.00**

☐ Certified Mail Restricted Delivery \$ **0.00**

☐ Adult Signature Required \$ **0.00**

☐ Adult Signature Restricted Delivery \$ **0.00**

**Postage**  
**\$ 7.67**

**Total Postage**  
**\$ 11.12**

**Sent To**  
**Street and Apt.**  
**City, State, ZIP**

**Noah Transport LLC**  
**Texas Secretary of State**  
**P.O. Box 12079**  
**Austin, Tx 78711**  
**2015-60723 133<sup>rd</sup>**

**PS Form 3800 April 2015 PSN 7530-02-000-9047 See Reverse for Instructions**

**Certified Mail service provides the following benefits:**

- A receipt (this portion of the Certified Mail label).
  - A unique identifier for your mailpiece.
  - Electronic verification of delivery or attempted delivery.
  - A record of delivery (including the recipient's signature) that is retained by the Postal Service™ for a specified period.
- Important Reminders:**
- You may purchase Certified Mail service with First-Class Mail®, First-Class Package Service®, or Priority Mail® service.
  - Certified Mail service is *not* available for international mail.
  - Insurance coverage is *not* available for purchase with Certified Mail service. However, the purchase of Certified Mail service does not change the insurance coverage automatically included with certain Priority Mail items.
  - For an additional fee, and with a proper endorsement on the mailpiece, you may request the following services:
    - Return receipt service, which provides a record of delivery (including the recipient's signature). You can request a hardcopy return receipt or an electronic version. For a hardcopy return receipt, complete PS Form 3811, *Domestic Return Receipt*, attach PS Form 3811 to your mailpiece;
    - Restricted delivery service, which provides delivery to the addressee specified by name, or to the addressee's authorized agent.
    - Adult signature service, which requires the signee to be at least 21 years of age (not available at retail).
    - Adult signature restricted delivery service, which requires the signee to be at least 21 years of age and provides delivery to the addressee specified by name, or to the addressee's authorized agent (not available at retail).
- for an electronic return receipt, see a retail associate for assistance. To receive a duplicate return receipt for no additional fee, present this USPS®-postmarked Certified Mail receipt to the retail associate.
- To ensure that your Certified Mail receipt is accepted as legal proof of mailing, it should bear a USPS postmark. If you would like a postmark on this Certified Mail receipt, please present your Certified Mail item at a Post Office™ for postmarking. If you don't need a postmark on this Certified Mail receipt, detach the barcoded portion of this label, affix it to the mailpiece, apply appropriate postage, and deposit the mailpiece.
- IMPORTANT: Save this receipt for your records.**

PS Form 3800, April 2015 (Reverse) PSN 7530-02-000-9047

**RECORDER'S MEMORANDUM**This instrument is of poor quality  
at the time of imaging





I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this December 7, 2015

Certified Document Number: 67601785 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

CONFIRMED FILE DATE: 10/29/2015

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <u>KANBY</u> C. Date of Delivery <u>10/29/15</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>1. Article Addressed to:</p> <p>Juan Gomez C/O: Texas Transportation Commission 125 E. 11<sup>th</sup> Street Austin, Tx 78701 2015-60723 133<sup>rd</sup></p>		<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail<sup>®</sup> <input type="checkbox"/> Priority Mail Express<sup>™</sup></p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7015 1520 0003 3653 6522</p>			

PS Form 3811, July 2013 Domestic Return Receipt

UNITED STATES POSTAL SERVICE

BY MAIL PROCESSING CENTER

2015 OCT 29 AM 10:29

HARRIS COUNTY, TEXAS

FILED

CHRIS DANIEL, DISTRICT CLERK  
HARRIS COUNTY, TEXAS  
CIVIL INTAKE  
P.O. BOX 4651  
HOUSTON, TEXAS 77210

Sender: Please print your name, address, and ZIP+4<sup>®</sup> in this box.

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

**FILED**  
Chris Daniel  
District Clerk

OCT 29 2015

Time: \_\_\_\_\_  
By: \_\_\_\_\_  
Harris County, Texas  
Deputy

RECORDER'S MEMORANDUM  
This instrument is of poor quality  
at the time of imaging



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this December 7, 2015

Certified Document Number: 67682889 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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CONFIRMED FILE DATE: 10/30/2015

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <b>X</b></p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Addressee (Print name and address on reverse if space permits)</p> <p>Noah Transport LLC C/O: Texas Secretary of State P.O. Box 12079 Austin, Tx 78711 2015-60723 133<sup>rd</sup></p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
		<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Priority Mail Express™  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>7015 1520 0003 3653 6515</p>	
<p>PS Form 3811, July 2013 Domestic Return Receipt</p>			
<p>UNITED STATES POSTAL SERVICE</p>			
<p>First-Class Mail Postage &amp; Fees Paid USPS Permit No. G-10</p>			
<p>• Sender: Please print your name, address, and ZIP+4® in this box•</p> <p>CHRIS DANIEL, DISTRICT HARRIS COUNTY, TEXAS CIVIL INTAKE P.O. BOX 4651 HOUSTON, TEXAS 77210</p> <p>FILED CHRIS DANIEL DISTRICT CLERK HARRIS COUNTY, TEXAS 2015 OCT 30 AM 10:19 BY MAIL PROCESSING 2</p>			

RECORDER'S MEMORANDUM  
This instrument is of poor quality  
at the time of imaging



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this December 7, 2015

Certified Document Number: 67694077 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

NO. 2015-60723

ARLEEN SANCHEZ	§	IN THE DISTRICT COURT OF
	§	
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
NOAH'S TRANSPORT, L.L.C. AND	§	
JUAN GOMEZ	§	133 <sup>rd</sup> JUDICIAL DISTRICT

**DEFENDANTS' ORIGINAL ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Noah's Transport, L.L.C. and Juan Gomez (hereinafter "Defendants"), in response to Plaintiff's Original Petition, files this its Original Answer and would respectfully show as follows:

**GENERAL DENIAL**

1. As allowed by Rule 92 of the Texas Rules of Civil Procedure, Defendants deny generally the allegations contained in Plaintiff's Original Petition and demands strict proof of each of the allegations contained therein.

WHEREFORE, PREMISES CONSIDERED, Defendants Noah's Transport, L.L.C. and Juan Gomez, respectfully prays that upon trial of this case, Defendants have judgment in its favor, that Plaintiff take nothing by reason of this suit, that Defendants recover its costs incurred herein, and that Defendants receive such further and other relief it is justly entitled.

Respectfully Submitted,

DONATO, MINX, BROWN & POOL, PC

By: /s/ Robert D. Brown

Robert D. Brown

SBN 03164715

Jeffrey B. Haas

SBN: 24033804

3200 Southwest Freeway

Phoenix Tower, Suite 2310

Houston, Texas 77027-7525

Phone: 713-877-1112

Fax: 713-877-1138

ATTORNEY FOR DEFENDANTS  
NOAH'S TRANSPORT, LLC AND  
JUAN GOMEZ



**CERTIFICATE OF SERVICE**

I hereby certify that, on the 7th day of December, 2015, a true and correct copy of the above and foregoing has been served by:

☒certified mail, return receipt requested; ☐overnight delivery; ☐hand delivery; ☐United States first class mail; ☐facsimile transmission; ☒electronic transmission on the following counsel:

Plaintiff's Attorney:  
Gene S. Hagood  
Emily T. Krone  
Law Office of Gene S. Hagood  
1520 e. Highway 6  
Alvin, TX 77511  
Phone: 281-331-5757  
Fax: 281-331-1105

/s/ Robert D. Brown  
Robert D. Brown/Jeffrey B. Haas